

/s/ Jeffrey C. Dan

SERVICE LIST

United States Trustee*
Dirksen Federal Court House
219 S. Dearborn St., Suite 873
Chicago, IL 60604

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10 S. LaSalle St., Suite 3400
Chicago, IL 60603

Laurie A. Silvestri*
Law Offices of Laurie A. Silvestri
70 W. Madison St., Ste. 5050
Chicago, IL 60602

Michael Cribbin*
12605 Kinvara
Palos Park, IL 60464

CitiFinancial Auto Corporation
P.O. Box 182287
Columbus, OH 43218

716 W. 50th Street LLC
525 Park Drive
Suite 248
Kenilworth, IL 60043

716 W. 50th Street LLC
9175 Gross Point Rd.
Suite 248
Skokie, IL 60077

Allied Interstate
3000 Corporate Exchange Drive
Columbus, OH 43231

Allied Interstate
PO Box 1954
Southgate, MI 48195-0954

Arrow Financial Services
5996 W. Touhy Ave.
Niles, IL 60714

Associated Bank
6100 N. Central Ave.
Chicago, IL 60646

Associated Bank F/K/A Assoicated Loan
Services
Attn: Asset Recovery Dept
1305 Main Street

Stevens Point WI 54481
Associated Bank N.A.
5200 N. Central Avenue
Chicago, IL 60630

AT&T
Collections
PO Box 8100
Aurora, IL 60507

ATG Credit, LLC
PO Box 14895
Chicago, IL 60614-4895

Lathrop & Gage
PO Box 2431
Philadelphia, PA 19178-2431

Bridgeport Row LLC
566 West Lake Street
Suite 280
Chicago, IL 60661

Citgo
PO Box 689095
Des Moines, IA 50368

Citgo
Processing Center
Des Moines, IA 50362-0300

City of Chicago
Dept. of Water Mangement
PO Box 6330
Chicago, IL 60680-6330

City of Chicago
Department of Revenue
P.O. Box 88298
Chicago, IL 60680-1290

City of Chicago
Dept. of Water Mgmt
PO Box 6330
Chicago, IL 60680-6330

City of Chicago
Dept. of Water Management
PO Box 6330
Chicago, IL 60680-6330

Client Services, Inc.
PO Box 1503
Saint Peters, MO 63376-0027

Client Services, Inc.
3451 Harry Truman Blvd.
Saint Charles, MO 63301-4047

ComEd
PO Box 6111
Carol Stream, IL 60197-6111

ComEd Co.
2100 Swift Drive
Attn.: Bankruptcy Section/Revenue Mgmt.
OakBrook, IL 60523

Commonwealth
Edison Company
Revenue Management
2100 Swift Drive
Oak Brook, IL 60523

Cook County Treasurer
PO Box 4488
Carol Stream, IL 60197-4488

Cook County Treasurer
P.O. Box 4468
Carol Stream, IL 60197-4468

Cook County Treasurer
PO Box 4488
Carol Stream, IL 60197

Cribbin Properties, Inc.
12605 Kinvara
Palos Park, IL 60464

Daniel G. Lauer & Assoc., P.C.
1424 W. Division
Chicago, IL 60642

Delaware Place Bank
190 E. Delaware Place
Chicago, IL 60611-1719

Emerald May LLC
566 W. Lake St
Suite 280
Chicago, IL 60661

Financial Services Center
c/o McMahan & Sigunick Ltd.
412 S. Wells, 6th Floor
Chicago, IL 60607

Financial Services Center
c/o McMahan & Sigunick, Ltd.
412 S. Wells St., 6th Fl.
Chicago, IL 60607

First Suburban National Bank
180 N. Wacker Drive
Chicago, IL 60606

First Suburban National Bank
c/o Laurie A. Silvestri
Three First National Plaza, Ste. 3700
Chicago, IL 60602

Frank A. Edelman, Ltd.
77 W. Washington St., Ste. 1514
Chicago, IL 60602-2801

GC Services Ltd. Partnership
Collection Agency Division
6330 Gulfon
Houston, TX 77081

Harris & Harris, Ltd
PO Box 5598
Chicago, IL 60680-5598

Harris & Harris, Ltd.
222 Merchandise Mart Plaza
Suite 1900
Chicago, IL 60654

Home Depot Credit Services
PO Box 6029
The Lakes, NV 88901-6029

I.C. System, Inc.
444 Highway 96 East
PO Box 64437
Saint Paul, MN 55164-0437

Illinois Department of Employment
Security
33 South State Street
Chicago, Illinois 60603
Attn: Bankruptcy Unit - 10th flr.

Illinois Department of Revenue
PO Box 19035
Springfield, IL 62794-9035

Illinois Department of Revenue
Bankruptcy Section
P.O. Box 64338
Chicago, Illinois 60664-0338

Illinois Department of Revenue
Bankruptcy Section Level 7-425
100 W. Randolph St.
Chicago, IL 60601

Illinois Dept. Employment Security
527 S. Wells
Chicago, IL 60607-3922

INTERNAL REVENUE SERVICE
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PHILADELPHIA, PA 19114

Internal Revenue Service
Cincinnati, OH 45999-0011

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Chicago, IL 60602

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Franklin Square, Ste. 1050 East
1300 Eye Street, NW
Washington, DC 20005

Lisle Savings Bank
Attn: Ralph Ream
1450 Maple Avenue
Lisle, IL 60532 -4142

LTD Financial Services
7322 Southwest Freeway, Ste. 1600
Houston, TX 77074

LTD Financial Services LP
PO Box 630788
Houston, TX 77263-0788

Markoff & Krasny
29 N. Wacker Dr., #500
Chicago, IL 60606-2854

MES/13716746
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PO Box 361598
Columbus, OH 43236-1598

Mobile Mini, Inc.
7420 S. Kyrene Rd., Ste. 101
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Attn: Roger Zamparo Jr.
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Olivia Homes LLC
70 W. Madison
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Chicago, IL 60602

Park National Bank
801 N. Clark
Chicago, IL 60610

PEOPLES GAS LIGHT & COKE
COMPANY
130 E. RANDOLPH DRIVE
CHICAGO, IL 60601

Professional Recovery Consultants,
Inc.
2700 Meridian Pkwy, Ste. 200
Durham, NC 27713-2204

R.M.S.
77 Hartland St., Ste. 401
East Hartford, CT 06108-0431

Rubenstein Lumber Co.
c/o Thomas Herz, Jr.
39 S. LaSalle St., Ste 720
Chicago, IL 60603

Secretary of State
State of Illinois
Business Services Department
Springfield, IL 62756

SouthwestCredit Systems, L.P.
5910 W. Plano Parkway
Ste. 100
Plano, TX 75093-4638

Union Street Homes, LLC
8820 Skokie Blvd.
#248
Skokie, IL 60077

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:)	Chapter 11
MICHAEL CRIBBIN)	Case 09-17207
Debtor/Debtor-in-Possession.)	Judge Carol A. Doyle

**NOTICE OF HEARING ON MOTION FOR FINAL ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES TO DEBTOR'S COUNSEL**

TO ALL CREDITORS AND PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on April 28, 2011, Crane, Heyman, Simon, Welch & Clar, counsel for the Debtor, filed a Motion for Allowance of Final Compensation and Reimbursement of Expenses (the "CHSWC Motion"), requesting the sum of \$36,836.50 for legal services rendered to the Debtor for the period commencing April 20, 2009 through and including April 26, 2011, plus costs advanced for the same period in the sum of \$2,141.61.

PLEASE TAKE FURTHER NOTICE that any person objecting to the CHSWC Motion, is directed to file their objection(s) in writing with the Clerk of the United States Bankruptcy Court, 219 South Dearborn Street, Chicago, Illinois 60604, on or before the hour of 4:30 p.m., on the **26th day of May, 2011**, with a copy of said objection(s) to be simultaneously served upon Jeffrey C. Dan, Crane, Heyman, Simon, Welch & Clar, 135 South LaSalle, Suite 3705, Chicago, Illinois 60603.

PLEASE TAKE FURTHER NOTICE that a hearing on the CHSWC Motion, together with objections timely filed, if any, will be held before the Honorable Carol A. Doyle, Bankruptcy Judge, Courtroom No. 742, 219 South Dearborn Street, Chicago, Illinois, on the **31st day of May, 2011**, at the hour of **10:00 a.m.**, at which time and place you may appear if you so see fit.

DATED: April 28, 2011

DEBTOR'S COUNSEL:

DAVID K. WELCH, ESQ. (Atty. No. 06183621)
ARTHUR G. SIMON, ESQ. (Atty. No. 03124481)
JEFFREY C. DAN, ESQ. (Atty. No. 06242750)
CRANE, HEYMAN, SIMON, WELCH & CLAR
135 South LaSalle, Suite 3705
Chicago, Illinois 60603
(312) 641-6777

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:) Chapter 11
MICHAEL CRIBBIN) Case 09-17207
Debtor/Debtor-in-Possession.) Judge Carol A. Doyle

**COVER SHEET FOR APPLICATION FOR
PROFESSIONAL COMPENSATION**

Name of Applicant: CRANE, HEYMAN, SIMON, WELCH & CLAR, Debtors' Counsel

Authorized to Provide
Professional Services to: Debtor

Date of Order
Authorizing Employment: June 2, 2009 (Retroactive to May 12, 2009)

Period for Which Compensation
is Sought: From: April 20, 2009 through April 26, 2011

Amount of Fees Sought: \$36,836.50

Amount of Expense
Reimbursement Sought: \$2,141.61

This is a(n): Interim Application Final Application X
If this is not the first Application filed herein by this professional, disclose as to all prior
fee applications:

<u>Date</u> <u>Filed</u> <u>None</u>	<u>Period Covered</u>	<u>Total</u> <u>Requested</u> <u>(Fees and</u> <u>Expenses)</u>	<u>Total</u> <u>Allowed</u>
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The aggregate amount of fees and expenses paid to the Applicant to date for services rendered and
expenses herein is:

Date: April 28, 2011

Applicant: Jeffrey C. Dan and the firm
Crane, Heyman, Simon, Welch & Clar

By: /s/Jeffrey C. Dan
Debtors' Counsel

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:)	Chapter 11
MICHAEL CRIBBIN)	Case 09-17207
Debtor/Debtor-in-Possession.)	Judge Carol A. Doyle

**MOTION FOR ALLOWANCE OF FINAL COMPENSATION
AND REIMBURSEMENT OF EXPENSES TO DEBTOR'S COUNSEL**

JEFFREY C. DAN and the law firm of CRANE, HEYMAN, SIMON, WELCH & CLAR ("CHSWC"), Counsel to MICHAEL CRIBBIN, Debtor/Debtor-in-Possession herein, make their Motion pursuant to Section 331 of the Bankruptcy Code for Allowance of Final Compensation and Reimbursement of Expenses for legal services rendered during the period April 20, 2009, through April 26, 2011; and in support thereof, state as follows:

Introduction

1. On May 12, 2009, the Debtor filed his voluntary petition for relief pursuant to Chapter 11 of the Bankruptcy Code.
2. The Debtor is operating his business and managing his financial affairs as Debtor-in-Possession. No trustee, examiner or committee of unsecured creditors has been appointed to serve in this Chapter 11 case.
3. On June 2, 2009, this Court entered an Order authorizing the Debtor to retain CHSWC as his Counsel in this Chapter 11 case retroactive to May 12, 2009, with compensation subject to the further Order of this Court.
4. By this Motion, CHSWC requests allowance of final compensation and reimbursement of expenses in the amounts of \$36,836.50 and \$2,141.61, respectively, for legal services rendered to the Debtor during the period April 20, 2009 through April

26, 2011. Itemizations of the legal services rendered and expenses incurred during the relevant period are attached to this Motion as **Exhibits A and B**, respectively.

5. CHSWC has received no prior allowances of interim compensation and expenses in this Chapter 11 case. However, CHSWC did receive a pre-petition retainer of \$21,039.00 which will be applied by CHSWC to any allowance of compensation and expenses made by this Court.

6. This Court has jurisdiction over this matter pursuant to 28 U.S.C. Sections 157 and 1334. This matter is a “core” proceeding within the meaning of 28 U.S.C. Section 157(b)(2)(A), (O).

7. The statutory predicates for the relief requested in this Motion are Sections 330 and 331 of the Bankruptcy Code and Rules 2002(a) and 2016(a) of the Federal Rules of Bankruptcy Procedure.

Relevant Factual Background

8. The Debtor is a real estate owner, investor and developer that resides in Palos Park, Illinois. The Debtor also owns membership interests and a number of limited liability companies that own, develop and rent real estate.

9. The Debtor’s operational and profitability problems were due in part to the general economic problems facing this country over the last several years (particularly in real estate) and the multitude of financial issues arising therefrom.

10. The Debtor was also a guarantor on numerous properties that were owned by LLCs in which the Debtor was a member, and in which the other member’s mismanagement and failure to pay mortgages led to the properties being foreclosed upon and the guaranties being called.

11. This Chapter 11 case was filed to allow the Debtor to reorganize and pay his creditors while maintaining his interests in the properties that remained.

12. On March 3, 2011, this Court entered an order confirming the Debtor's First Amended Plan of Reorganization.

13. Other events have occurred during the course of this Chapter 11 case which are detailed later in this Motion.

**Final Compensation
and Expenses Requested**

14. CHSWC is a law firm whose practice is almost exclusively concentrated in the fields of bankruptcy, reorganization and insolvency. CHSWC is comprised of six (6) members and one (1) associate, some of whom have participated in representing the Debtors in these bankruptcy cases.

15. The following is biographical information pertaining to those attorneys who have been primarily involved in the representation of the Debtors. Other attorneys at CHSWC have also participated to a lesser extent in these Chapter 11 cases. Each such attorney has significant experience and expertise in bankruptcy, reorganization and litigation matters.

16. JEFFREY C. DAN is a member of CHSWC and has been practicing law in the State of Illinois since 1997. He graduated from DePaul University School of Law. He has practiced as a trial attorney in a number of areas of the law including personal injury, domestic relations, criminal law and commercial litigation. Mr. Dan joined the firm in September of 2002 and has been actively involved in all aspects of bankruptcy and bankruptcy litigation as well as State Court litigation that arises in insolvency matters. He has served as a member of the Illinois State Bar Association, Commercial Banking and Bankruptcy Law Section Council. Mr. Dan is a member of the Federal Trial Bar and is admitted to practice before the United States Court of Appeals for the Seventh Circuit and the United States Court of Appeals for the Third Circuit. He is also admitted to practice before the United States District Courts for the Northern District of

Illinois, Northern District of Indiana, Central District of Illinois and Eastern District of Wisconsin.

17. DAVID K. WELCH is a member of CHSWC and has been practicing law in the State of Illinois since 1982. His practice has always been primarily concentrated in the fields of bankruptcy, reorganization, insolvency and debtor's and creditor's rights. He has represented debtors, trustees, creditors' committees, secured creditors, unsecured creditors and equity holders. From October, 1979, through June, 1982, he served as Deputy Chapter 13 Trustee in the Northern District of Illinois under Craig Phelps, Chapter 13 Trustee. He has authored articles for the Illinois Institute of Continuing Legal Education on matters involving bankruptcy and insolvency. He has lectured at seminars relating to bankruptcy issues at the Chicago Bar Association. He has served as a member of the Bankruptcy Mediation Panel Sub-Committee of the Chicago Bar Association. Furthermore, in conjunction with his financial mediation and negotiation training, he has completed a course sponsored by the National Institute for Trial Advocacy in conjunction with Northwestern University. He is a member of the Federal Trial Bar and is admitted to practice before the United States Court of Appeals for the Seventh Circuit and the United States Court of Appeals for the Third Circuit. He is a member of several other bar associations and legal organizations. He was formerly a member of the Standing Committee of the Illinois State Bar Association on Liaison with the Attorney Registration and Disciplinary Commission. Mr. Welch is also admitted to practice in the United States District Courts for the Northern District of Indiana, Central District of Illinois and Eastern District of Wisconsin. Mr. Welch is the former Chairman of the Chicago Bar Association Committee on Bankruptcy and Reorganization, is a former member of the Advisory Board of the American Bankruptcy Institute, and is the former Vice Chair of the Bankruptcy Court Liaison Committee.

18. ARTHUR G. SIMON is a member of CHSWC and has been practicing law

in the State of Illinois since 1979. Beginning in 1981, he became engaged almost exclusively in the practice of bankruptcy and insolvency litigation and has represented virtually every type of party in such matters, including Chapter 7 and Chapter 11 debtors, secured creditors, landlords, trustees, and creditors' committees. His activities have included, among others, membership in the Chicago Bar Association Committee on Bankruptcy and Reorganizations and Illinois State Bar Association, Commercial, Banking and Bankruptcy Law Section Council. He formerly served as the Editor of the Committee on Bankruptcy Advance Sheets of the Chicago Bar Association. In that capacity, he reported the rulings and opinions of the Bankruptcy Judges in the Northern District of Illinois to the Bankruptcy Committee members of the Chicago Bar Association. He has also provided the same service in his role as a member of the Illinois State Bar Association Commercial, Banking and Bankruptcy Law Section Council. He is a former elected delegate to the Illinois State Bar Association assembly. Mr. Simon is a member of the Federal Trial Bar and is admitted to practice before the United States Court of Appeals for the Seventh Circuit and the United States Court of Appeals for the Third Circuit.

19. The hourly rates usually charged by CHSWC in matters of this nature are as follows:

	2009	2010 ¹	2011
<u>Attorney</u>	<u>Hourly Rate</u>	<u>Hourly Rate</u>	<u>Hourly Rate</u>
Eugene Crane (EC) ²	\$465.00	\$475.00	\$485.00
Glenn R. Heyman (GRH)	\$465.00	\$475.00	\$485.00
Arthur G. Simon (AGS)	\$425.00	\$435.00	\$450.00
David K. Welch (DKW)	\$425.00	\$435.00	\$450.00
Scott R. Clar (SRC)	\$425.00	\$435.00	\$450.00
Jeffrey C. Dan (JCD)	\$325.00	\$350.00	\$375.00
John H. Redfield (JHR)		\$350.00	\$360.00

¹The hourly rate change became effective on February 3, 2010.

² These are the abbreviations utilized in the Exhibits to this Motion.

20. The following is a chart that depicts the total hours that each attorney at CHSWC expended in representing the Debtor during the relevant period:

<u>Attorney</u>	<u>2009 Hours</u>	<u>2010 Hours</u>	<u>2011 Hours</u>	<u>Amount</u>
Glenn R. Heyman	1.30			\$ 604.50
David K. Welch	6.40	.20		\$ 2,807.00
Arthur G. Simon	2.20			\$ 935.00
Jeffrey C. Dan	<u>46.30</u>	<u>31.30</u>	<u>17.30</u>	<u>\$32,490.00</u>
Total	56.20	31.50	17.30	\$36,836.50

21. During the course of the representation of the Debtor during the relevant period, CHSWC incurred expenses of \$2,141.61. These expenses are itemized on **Exhibit B** to this Motion.

Legal Services Rendered to the Debtor

22. The representation of the Debtor is categorized in this Motion as follows:

A. **General Administration**

The matters in this category include assisting the Debtor with the general administration of this bankruptcy case and the Debtor's business operations and financial affairs, filing routine motions and filing professionals' fee applications and retention motions. Also included in this category are legal services related to preparing bankruptcy schedules and statement of financial affairs, attending creditors meetings convened under Section 341 of the Bankruptcy Code and assisting the Debtor with his monthly operating reports.

Total Time Expended				51.90 hours
<u>Attorney</u>	<u>2009 Hours</u>	<u>2010 Hours</u>	<u>2011 Hours</u>	<u>Amount</u>
Glenn R. Heyman (GRH)	.70			\$ 325.50
David K. Welch (DKW)	4.10			\$ 1,742.50
Arthur G. Simon (AGS)	.50			\$ 212.50
Jeffrey C. Dan (JCD)	<u>32.70</u>	<u>7.90</u>	<u>6.00</u>	<u>\$15,642.50</u>
TOTAL	<u>38.00</u>	<u>7.90</u>	<u>6.00</u>	<u>\$17,923.00</u>

Attached to this Motion as **Exhibit C** is an itemization of the legal services rendered in this category.

B. Secured Creditor Issues

The key to this Chapter 11 case was the Debtor's ability to work his issues out with the secured creditors on the various properties that were held in his name. The Debtor, with the assistance of CHSWC, worked with the secured creditors regarding issues involving modifying the automatic stay regarding certain properties and resolving issues surrounding the Debtor's properties and the mortgages and taxes on said properties. Two of the properties were surrendered to the secured creditor in exchange for a waiver of claims and the Debtor, through CHSWC, was able to obtain new mortgages on the other two properties.

Total Time Expended				20.60 hours
<u>Attorney</u>	<u>2009 Hours</u>	<u>2010 Hours</u>	<u>2011 Hours</u>	<u>Amount</u>
Glenn R. Heyman (GRH)	.60			\$ 279.00
David K. Welch (DKW)	2.00	.20		\$ 937.00
Jeffrey C. Dan (JCD)	<u>8.00</u>	<u>9.10</u>	<u>.70</u>	<u>\$6,047.50</u>
TOTAL	<u>10.6</u>	<u>9.30</u>	<u>.70</u>	<u>\$7,263.50</u>

Attached to this Motion as **Exhibit D** is an itemization of the legal services rendered in this category.

C. Chapter 11 Exit Strategy

CHSWC advised the Debtor of his options with respect to emerging from this Chapter 11 case. CHSWC subsequently filed a Plan of Reorganization and Disclosure Statement, as well as amendments to both documents. This Court held a hearing on the adequacy of the Disclosure Statement and a confirmation hearing on the Plan of Reorganization. This Court entered an Order confirming the First Amended Plan of Reorganization. This category includes the preparation of the Plan and Disclosure Statement, preparation for and attendance at hearings on the Plan and Disclosure Statement and negotiation and correspondence with creditors and the Debtor regarding same.

Total Time Expended				24.30 hours
<u>Attorney</u>	<u>2009 Hours</u>	<u>2010 Hours</u>	<u>2011 Hours</u>	<u>Amount</u>
Jeffrey C. Dan (JCD)	<u>.60</u>	<u>14.20</u>	<u>9.50</u>	<u>\$8,727.50</u>

TOTAL	<u>.60</u>	<u>14.20</u>	<u>9.50</u>	<u>\$8,727.50</u>
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Attached to this Motion as **Exhibit E** is an itemization of the legal services rendered in this category.

D. LLC Related Issues

The Debtor was a guarantor on numerous properties owned by LLCs in which the Debtor was a Member. CHSWC worked with lenders that sought recoveries on the guaranties to work out issues regarding the properties in which the lenders had a security interest and to resolve the claims against the Debtor regarding the guaranties.

Total Time Expended	8.20 hours			
<u>Attorney</u>	<u>2009 Hours</u>	<u>2010 Hours</u>	<u>2011 Hours</u>	<u>Amount</u>
David K. Welch (DKW)	.30			\$ 127.50
Arthur G. Simon (AGS)	1.70			\$ 722.50
Jeffrey C. Dan (JCD)	<u>5.00</u>	<u>.10</u>	<u>1.10</u>	<u>\$2,072.50</u>
TOTAL	<u>7.00</u>	<u>.10</u>	<u>1.10</u>	<u>\$2,922.50</u>

Attached to this Motion as **Exhibit F** is an itemization of the legal services rendered in this category.

Conclusion

23. Other than as provided in Section 504(b) of the Bankruptcy Code, CHSWC has not shared, nor agreed to share, any compensation received as a result of this case with any person, firm or entity. The sole and exclusive source of compensation shall be funds of the Debtor.

24. CHSWC asserts that the compensation requested in this Motion is reasonable compensation for the actual and necessary legal services rendered based upon the time, nature, extent and value of such professional services. CHSWC further asserts that the cost of legal services rendered for and on behalf of the Debtor is comparable to the cost of similar services in matters other than under the Bankruptcy Code.

25. CHSWC asserts that the expenses for which reimbursement is sought in this Motion are reasonable and were actual and necessary expenditures required in the representation of the Debtor.

26. CHSWC submits that the compensation and expenses requested are fair, reasonable and warranted under the circumstances.

WHEREFORE, JEFFREY C. DAN and the law firm of CRANE, HEYMAN, SIMON, WELCH & CLAR, Debtor's Counsel, pray for the entry of an Order allowing interim compensation and reimbursement of expenses in the amounts of \$36,836.50 and \$2,141.61, respectively; and granting such other relief as may be just and appropriate.

Respectfully Submitted,

JEFFREY C. DAN, and the law firm of CRANE,
HEYMAN, SIMON, WELCH & CLAR

By: /s/Jeffrey C. Dan

DEBTOR'S COUNSEL:

DAVID K. WELCH, ESQ. (Atty. No. 06183621)
ARTHUR G. SIMON, ESQ. (Atty. No. 03124481)
JEFFREY C. DAN, ESQ. (Atty. No. 06242750)
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